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June 28, 2018

ECF/CM

The Honorable Edgardo Ramos
United States District Court
for the Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Gammal*, 15 Cr. 588 (S.D.N.Y.) (ER)

Dear Judge Ramos:

The sentencing for our client Ahmed el Gammal is currently scheduled for August 2, 2018. I have been coordinating with several parties in New York City and elsewhere, including individuals overseas, to obtain the information and materials the defense believes are critical as this Court assesses the 18 U.S.C. § 3553(a) factors and ultimately fashions a sentence sufficient but not greater than necessary to accomplish the goals of the federal sentencing regime here. Given various logistical challenges, as well as the fact that for much of June I was engaged in trial before the Hon. Katherine B. Forrest, we do not expect to have all of the information we would like to present to the Court in time for the current sentencing date. This is the second request for a sentencing adjournment. I have discussed the adjournment with the prosecutors who have told me they consent to this request.

I therefore respectfully ask that the Court adjourn Mr. Gammal's sentencing date until sometime after September 17, 2018, with disclosure of the presentence investigation report (PSR) adjusted consistent with this Court's prior order, such that the final PSR be provided to the Court at least 14 days prior to the sentencing, but otherwise relieving the probation officer of the completion dates in the Amended Standing Order docketed at docketed at 14-mc-141.

Respectfully,

/s/ Megan W. Benett

Cc: All counsel of record via ECF/CM

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